

APPENDIX A

BASF'S RESPONSES TO PLAINTIFFS' REMAINING OBJECTIONS**February 21, 2018**

No.	TESTIMONY	PLAINTIFFS' RENEWED OBJECTION	BASF'S RESPONSE
1.	<p>Q: And what was the nature of that communication?</p> <p>MR. COREN: To the extent that it was a counsel meeting, I'm going to instruct her not to answer on the basis of attorney-client privilege.</p> <p>Q: Did you speak to Mr. Bevan on Tuesday about the Williams case or something else?</p> <p>A: I couldn't speak to what we spoke of because it's under attorney-client privilege.</p> <p>Q: Did you discuss with Mr. Bevan your deposition today?</p> <p>A: Again, anything we discussed would be attorney-client privilege.</p> <p>Q: So you can't tell me whether you discussed preparation for your deposition with Mr. Bevan?</p> <p>MR. COREN: She's just asserted her attorney-client privilege, Peter. I don't understand the difference between the first and second question.</p>	Attorney-Client Privilege	Plaintiffs have waived their privilege over conversations with Mr. Bevan.
5.	<p>Q: At that meeting with Mr. Bevan and Mr. Coren, was that when you first learned about the allegations that are in the Williams complaint?</p> <p>MR. COREN: Objection. Privilege.</p> <p>A: That would be privileged information. I'm choosing not to answer.</p>	Attorney-Client Privilege	Plaintiffs have waived their privilege over conversations with Mr. Bevan.

9.	<p>Q: Do you know of any [of your attorneys] who has [researched other cases or complaints that have been filed against BASF or Engelhard in the past]?</p> <p>MR. COREN: Objection. Now you're getting back -- once again, it's work product. Now you're getting into attorney-client communication. So I'm instructing her not to answer.</p>	Attorney-Client Privilege	Plaintiffs have waived their privilege over conversations with Mr. Bevan.
22.	<p>Q: Did the Cohen Placitella firm ask you for a copy of the Bevan firm's opposition to BASF's Motion for Summary Judgment?</p> <p>MR. COREN: Objection. Don't answer. Privilege.</p>	Attorney-Client Privilege	<p>Plaintiffs have waived their privilege over conversations with the Bevan Firm.</p> <p>Moreover, the status of documents in plaintiffs' possession is not privileged.</p>